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The Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 21B
New York, NY 10007-1312

By Hand and ECF

February 13, 2015

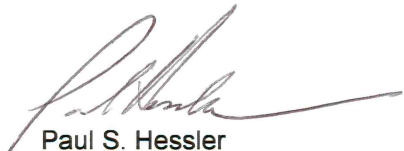
RE: ICBC (London) plc v. The Blacksands Pacific Group, Inc., Index No. 15 Civ. 0070 (LAK) (FM)

Dear Judge Kaplan:

We represent Plaintiff and Counter-Defendant ICBC (London) plc.

We write to inform the Court, in accordance with the Court's Motion Rules and Procedures, that counsel for both Parties have conferred, and are available for oral argument regarding Plaintiff's Motion for Summary Judgment on each of the following six Monday mornings, save for this coming Monday, February 16, 2015, which is a Federal holiday.

Respectfully Submitted,



Paul S. Hessler
On Behalf of ICBC (London) plc

cc (by email): Kevin J. Fee, Esq., Kornstein Veisz Wexler & Pollard, LLP